

EXHIBIT A

Status	Number of Custodians	Custodian Names
Uber has not provided any dates	3	Burke, Hourdajian, Kaiser
Uber will seek a Protective Order	4	Chang, Graves, Henley, Kansal
Uber provided dates that do not comply with PTO 20 or occur before Plaintiffs will receive or the employee's post-November 2023 documents	2	Joyce, Anderson
Agreed dates	8	Cinelli, Ding, Fuldner, Fogg, Hawk, Richter, Shuping, Luu
Current employees for whom Uber has provided dates in March, April, or May, but Plaintiffs seek an earlier date and January or February	3	Freivogel, Holt, Lake
Former employees for whom Uber provided a late February date, but Plaintiffs request an alternative January or February date	1	Breeden

	Custodian	Deposition Date Range Per PTO 20	Plaintiffs' Proposed Dates Sent on 12/13/2024	Uber Proposed Dates	Current Employee (Y/N)	Plaintiffs' Response
1	Anderson, Brooke	Feb. 19 - April 24	Feb 26, 27 and 28	March 3, 4	Y	On January 3, Uber offered March 27 and 28, which Plaintiffs accepted on January 10. On January 13, Uber withdrew the March 27 and 28 dates and instead offered March 3 and 4. March 3 and 4 are unworkable because Anderson's post-November 2023 documents will not be produced until March 4. Plaintiffs request that Uber provide a deposition date after March 11.
2	Breeden, Tracey	Jan. 18 - April 24	Jan. 28/29	February 25 and 26	N	Plaintiffs seek to proceed with the deposition on Jan. 28/29 as Uber has indicated Ms. Breeden is available. Per PTO 20, this deposition could occur as early as January 18. Breeden was not employed by Uber after November 2023 and therefore can be deposed in January or February. Plaintiffs informed Uber on December 29 that Plaintiffs are not available on the dates provided and requested alternative dates, which Uber has not provided.
3	Burke, Jordan	Feb. 19 – April 24	Feb. 19. 20 and 21	No date provided	N	Plaintiffs re-request a post-February 19 date.
4	Chang, Frank	Feb. 19 - April 24	May	Uber moving for Protective	Y	Plaintiffs request that Uber provide a deposition date for April and if Uber

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				Order in JCCP. Placeholder date of "May" provided if Uber unsuccessful in JCCP.		intends to seek a Protective Order, to provide its portion of a PTO 8 letter to Plaintiffs by January 24.
5	Cinelli, Dennis	Jan. 18 – April 24	January 23, 30 and 31	March 14, 21, 25 or 28	N	March 28 confirmed.
6	Ding, Abbie	March 24 - April 24	April 1, 2, 3	March 3-7; April 3, 4, 7 or 8	Y	April 3 and 4 confirmed.
7	Fogg, Chad	Feb. 19 – April 24	March 18, 19, and 26	March 25, April 1-2, or April 7-8	Y	March 25 confirmed.
8	Freivogel, Cory	Jan. 18 - April 24	Feb 4, 5, 6	week of April 28 or week of May 12	Y	Plaintiffs re-request a February deposition date. Per PTO 20, this deposition could occur as early as January 18. Although Freivogel was employed by Uber after November 2023, Plaintiffs are willing to take his deposition without the benefit of his post-November 2023 documents. Plaintiffs reserve the right to reopen

	Custodian	Deposition Date Range Per PTO 20	Plaintiffs' Proposed Dates Sent on 12/13/2024	Uber Proposed Dates	Current Employee (Y/N)	Plaintiffs' Response
						the deposition for good cause shown after Uber's production of post-November 2023 documents.
9	Fuldner, Gus	TBD	Jan. 27	March 10 or 17	Y	March 10 (all day) and March 11 (after 11am PT) confirmed.
10	Graves, Ryan	Feb. 19 – April 24	March 5, 6 and April 1	Uber moving for Protective Order in JCCP and no deposition date proposed	N	Plaintiffs request that Uber provide a deposition date for March and if Uber intends to seek a Protective Order, to provide its portion of a PTO 8 letter to Plaintiffs by January 24.
11	Hawk, Cassie	Feb. 19 - April 24	Feb. 25, 26, or 27	April 8 or 9	Y	April 8 and 9 confirmed.
12	Henley, Mat	March 24 - April 24	Apr 10, 15, 16	Uber moving for Protective Order in JCCP. Placeholder date of April 22 or 29 or May 6 provided if Uber unsuccessful in JCCP.	N	May 6 confirmed as a placeholder. Plaintiffs request that if Uber intends to seek a Protective Order, Uber provide its portion of a PTO 8 letter to Plaintiffs by January 24.
13	Holt, Rachel	TBD	Feb 6, 10 or 12	April 1 or 9	N	Plaintiffs re-request a January or February deposition date. Per PTO 20, privilege disputes regarding this

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						custodian should be resolved shortly. Holt was not employed by Uber after November 2023 and therefore can be deposed in January or February.
14	Hourdajian, Nairi	March 24 – April 24	April 7, 1, and 11	No date provided	N	Plaintiffs re-request an April deposition date.
15	Joyce, Meghan	March 24 – April 24	April 16, 17 and 18	Week of February 24	N	Plaintiffs re-request an April deposition date. Uber's proposed deposition dates occur prior to the deposition date range the Court set by PTO 20.
16	Kaiser, Roger	TBD	Jan. 14, 15 and 21	No date provided	Y	Plaintiffs request a date after March 11 to account for Uber's production of post-November 2023 documents on March 4.
17	Kansal, Sachin	Feb. 19 - April 24	April 9, 10, 11	Uber moving for Protective Order in JCCP. On January 3, Uber offered a placeholder date of 3/13/2025, which Plaintiffs accepted on	Y	Plaintiffs request that Uber provide a placeholder date in April and if intends to seek a Protective Order, Uber provide its portion of a PTO 8 letter to Plaintiffs by January 24.

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				January 10. Uber withdrew this date on January 13 and offered "May" instead.		
18	Lake, Carley	Jan. 18 - April 24	Feb. 13	March 20 and 21	N	Plaintiffs re-request a January or February deposition date. Per PTO 20, this deposition could occur as early as January 18. Lake was not employed by Uber after November 2023 and therefore can be deposed in January or February.
19	Luu, Jenny	March 24 – April 24	April 3, 4, 10 and 11	Weeks of February 17 or 24	Y	Plaintiffs agree to February 27 even though Uber's proposed deposition dates occur prior to the deposition date range the Court set by PTO 20. Further, Luu's post November 2023 documents will not be produced until after Uber's proposed deposition dates. Plaintiffs reserve the right to reopen the deposition if good cause is shown after Uber's production of de-designated documents or post-November 2023 documents.
20	Richter, David	March 24 - April 24	March 29 and 30	February 17 or 24 or March 3, 17, 24 or 31	N	March 24 confirmed.

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21	Shuping, Valerie	Feb. 19 - April 24	March 7, 13, 14	March 6 and 7	N	March 6 and 7 confirmed on behalf of the MDL. MDL Plaintiffs are happy to coordinate with JCCP, however, if JCCP cannot proceed on these dates, this deposition should proceed nonetheless in the MDL.